

ZMO LAW PLLC

March 23, 2023

Via ECF

Hon. Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *United States of America v. Moses Valdez*, 22-CR-551

Dear Judge Rochon:

This office represents Moses Valdez in the above-captioned matter. A status conference is scheduled in this case for April 6, 2023 at 10:00 a.m. We write to request that Mr. Valdez be excused from appearing personally at the conference. Mr. Valdez would prefer to waive his appearance altogether or, in the alternative, appear via telephone or videoconference.

I have communicated with AUSA Benjamin Gianforte and he advises that the government does not object to this request.

The reasons that Mr. Valdez should be excused from the conference are that he lives in California and recently began a new job. Mr. Valdez is indigent and requiring him to travel to New York for the conference would work an undue financial hardship on him. Similarly, requiring him to appear during the workday for more than a few minutes could jeopardize his new job, which took months to find.

Thank you for your attention to this case.

Application **GRANTED**. Counsel may appear in person and his client Moses Valdez shall appear by telephone at the April 6, 2023 status conference. Counsel shall provide the Court with Mr. Valdez's telephone number shortly before the start of the conference.

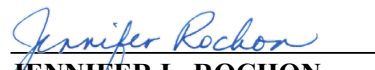
Very truly yours,

Zachary Margulis-Ohnuma

Zachary Margulis-Ohnuma

Dated: March 23, 2023
New York, New York
CC: All Counsel

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge